

Idaho Greater Sage-Grouse Comment Submissions via ePlanning Web Form

Submission ID	Subject	Submission Text
<a href="#">ID-GRSG-1-160208</a>	Sage Grouse	How does eliminating the 7” grass height requirement allow for adequate Sage Grouse reproduction? I thought that Sage Grouse are a threatened/endangered species. Does this mean that golf courses could get permits for development in Sage Grouse habitat? Obviously not, but the point is where do you draw the line? My understanding is that ranchers are open to working with the BLM to protect Sage Grouse habitat when they are supported to do so. It appears the State of Idaho and the BLM are prioritizing grazing rights and resource extraction over conserving natural habitats that are critical to the survival of Sage Grouse and other species diversification. Additionally, haven’t conservation organizations been trying to work with government agencies on this issue and not take it to the courts i.e. agreeing not to push forward with getting the Sage Grouse designated as an Endangered Species? Won’t your actions in this new plan force them to take the issue to the courts? And won’t that cost we taxpayers money that would better spent on creating healthy environments for all, including we humans? This plan is a disaster on so many levels. What has changed is that our modern society has better tools to fight the special interests behind this push to open our public lands to destruction. Please don’t waste our public money on this fight. Work for the highest good, not speical interests. The survival of the Sage Grouse is a MAJOR issue. Please do what is right and protect this species and our wild habitat.
<a href="#">ID-GRSG-1-160358</a>	Undefined	<p>“How does eliminating the 7” grass height requirement allow for adequate Sage Grouse reproduction? I thought that Sage Grouse are a threatened/endangered species. Does this mean that golf courses could get permits for development in Sage Grouse habitat? Where do you draw the line? My understanding is that ranchers are open to working with the BLM to protect Sage Grouse habitat when they are supported to do so. It appears the State of Idaho and the BLM are prioritizing grazing rights and resource extraction over conserving natural habitats that are critical to the survival of Sage Grouse and other species diversification. Additionally, haven’t conservation organizations been trying to work with government agencies on this issue and not take it to the courts i.e. agreeing not to push forward with getting the Sage Grouse designated as an Endangered Species? Won’t your actions in this new plan force them to take the issue to the courts? And won’t that cost we taxpayers money that would better spent on creating healthy environments for all, including we humans? This plan is a disaster on so many levels. What has changed is that our modern society has better tools to fight the special interests behind this push to open our public lands to destruction. Please don’t waste our public money on this fight. Work for the highest good, not special interests. The survival of the Sage Grouse is a MAJOR issue. Please do what is right and protect this species and our wild habitat.”</p> <p>I have copied my friend, M. Burrell’s statement to you. I agree with what she states here. Do NOT prioritize grazing rights and resource extraction over natural habitats that are critical to the survival of Sage Grouse and other species diversification. You are playing the short, lazy game that can only lead to a loss of what makes Idaho so wonderful..it’s unique habitat. Please play the long game, find the thirdway that works for both the ranchers and nature. You are so close. Don’t stop now! Thank you</p>
<a href="#">ID-GRSG-1-160602</a>	Sage Grouse Protection	It appears the State of Idaho and the BLM are prioritizing grazing rights and resource extraction over conserving natural habitats that are critical to the survival of Sage Grouse and other species diversification. The survival of the Sage Grouse is a MAJOR issue. Please do what is right and protect this species and our wild habitat.
<a href="#">ID-GRSG-1-161300</a>	Undefined	<p>I do not want to eilimintate the much needed Sagebrush Focal Areas or reduce the buffer zones for the Sage Grouse. Please keep the oil and gas development and cattle grazing away from these few last birds and give them the time and room they need to repopulate In Idaho. Birding is a big tourist draw in Idaho if Idaho needs an economic reason to consider the survival of the Sage Grouse. I just want to save them because there is room for them and the wildness they represent if we make them a priority.</p> <p>Denise DeCoster 137 Sioux Drive, Hailey, ID 83333 208-315-1992 denisedecoster@aol.com</p>
<a href="#">ID-GRSG-1-210063</a>	Sage Grouse Plan comment	See attached statement
<a href="#">ID-GRSG-1-216032</a>	Idaho Sage Grouse Habitat	Attached letter
<a href="#">ID-GRSG-1-216360</a>	Opposition to Plan Revisions to Roll-back existing protections	<p>As someone who cares about birds and the places they need, and as a professional biologist who spent their entire 35+ year career in conservation science, I strongly oppose any efforts to weaken the conservation protections in the Bureau of Land Management’s (BLM) sage-grouse land management plans. These birds are part of an iconic western ecosystem, the sagebrush habitat, which supports over 350 species including Golden Eagles and mule deer. They are an important part of our heritage.</p> <p>In 2010, the U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse populations were in serious trouble and warranted protection under the Endangered Species Act (ESA).</p> <p>An unprecedented numbers of stakeholders across the West worked for many years on ensuring that sage-grouse management is based on science and good for our local economies. The plans that were agreed to in 2015 led the FWS to reverse its 2010 decision and find the future for sage-grouse was secure: a historic victory for conservation and for collaboration.</p> <p>Instead of amending the plans by weakening protections, pointedly prioritizing oil and gas development over protected species, BLM should focus on engaging communities in the decisions necessary to implement the plans as they are. Give the plans a chance to work. The recently issues Instruction Memoranda generally retreat from the protections set out in previous guidance to field staff in 2016. The first IM, issued in December 2017, reverses existing policy, directing BLM field offices to prioritize oil and natural gas leasing and drilling projects outside of the most sensitive sage grouse habitat. Instead, it states that BLM “does not need to lease and develop outside of [grouse] habitat</p>

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		<p>management areas before considering any leasing and development within [grouse] habitat.” The second IM, issued in January 2018, eliminates requirements for public notice and comment “when conditions worsen and there is a need for action” under adaptive management provisions in the grouse plans. It also shortens the public protest period for oil and gas lease sale parcels to 10 days from 30 days</p> <p>If there are any changes that experts deem necessary, these should instead be done via minor plan amendments, also known as “maintenance actions.” A complete rewrite is an unnecessary waste of federal resources, and risks upending the official finding made by the FWS that a listing under the ESA is not needed.</p> <p>These federal management plans must keep key elements that biologists believe are necessary to avoid the need for listing the species under the ESA. Specifically:</p> <p>Development on existing leases should be managed per regulations that are currently in place, which limit surface occupancy and disturbance. Years of research leave no doubt that sage-grouse do not do well in close proximity to energy development. More development in the most important habitat will not help conserve the species.</p> <p>Good mitigation policy and practice is one of the best opportunities to achieve sustainable development and conservation goals. Where impacts cannot be avoided or minimized, well-designed compensatory mitigation programs can achieve the multiple-use, sustained yield objectives.</p> <p>Do not strip the fundamental mitigation goal of “net conservation gain” from the plans. A no net loss of habitat merely prevents additional habitat loss and is not adequate to achieve long-term conservation of sage-grouse.</p> <p>Improve plan monitoring and oversight, including providing training to field staff and the necessary incentives to ensure proper implementation. The plans should contain metrics by which conservation success can be measured. Conservation metrics will help in effective management of the habitat and reduce wasting personnel time and limited funds.</p> <p>The plans contain many new provisions that serve as loopholes and exceptions to habitat protections. We need certainty that crucial habitat will be protected to ensure the species thrives into the future. If the revisions are adopted, thousands of wells could move into the species core habitats, potentially leading to a listing of the species as endangered</p> <p>Thank you for considering my comments.</p>
<a href="#">ID-GRSG-1-216845</a>	Petan Company of Nevada, Inc. Comments	Please see the attached PDF file. A hard copy will also be mailed.
<a href="#">ID-GRSG-1-216850</a>	Riddle Ranches, Inc. Comments	Please see the attached PDF file. A hard copy will also be mailed.
<a href="#">ID-GRSG-1-217335</a>	2018 sage-grouse DEIS WLD Comments	<p>Dear BLM,</p> <p>Here are WLD comments on the sage-grouse DEIS, We carry forward al l concerns submitted during scoping in this current process.</p> <p>Let us know you have received these comments.</p> <p>Katie Fite Public Lands Director WildLands Defense PO Box 125 Boise, ID 83701</p>
<a href="#">ID-GRSG-1-218083</a>	J.R. Simplot Comments on 2018 Idaho GRSG Draft RMPA/EIS	Attached are comments from the J.R. Simplot Company on the 2018 Idaho GRSG RMPS/EIS.
<a href="#">ID-GRSG-1-218203</a>	Comments on Idaho GRSG Draft RMPA/EIS	<p>I am writing to comment on the draft environmental impact statement (DEIS) on the proposed Sage grouse resource management plan (RMP) amendments.</p> <p>I was a rancher with federal grazing permits in Sage grouse habitat. However the Pony Complex fire destroyed essentially all of the sagebrush on my allotment and drastically increased the proportion of my allotment that is dominated by annual grasses. I am 68 years old and did not expect to live long enough to see the habitat recover within my</p>

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		<p>lifetime. Nevertheless, I do support the DOI efforts to improve that Idaho’s Sage grouse management plan.</p> <p>I agree with the elimination of the sagebrush focal areas in the plan. They would just result in an increase in paperwork and regulation similar to that which has been ineffective since the beginning of efforts to improve Sage grouse habitat.</p> <p>The BLM certainly has the ability and authority and adequate mechanisms in place to effectively manage grazing in Sage grouse habitat should they choose to do so. The contents of the 2015 plan were unnecessary, ineffective and threatened the health of the range on my allotment endangering the future of my grazing permit and my livelihood.</p> <p>Professional range managers, ranchers, the academic community involved in rangeland resource management and the Agricultural Research Service have been advising the BLM for many years of the need to reduce the presence of annual grasses and the fuel load they produce to break the fire cycle which is the primary threat to Sage grouse. The BLM in California’s annual grasslands has demonstrated the ability to manage those grasslands far more effectively than the BLM has done in Idaho. The BLM’s refusal in Idaho to reduce fuel loads with grazing, the only method available which is affordable and can be employed quickly has resulted in the massive loss of Sage grouse habitat to fire and annual grasses.</p> <p>Secretary Zinke has recently issued clear written guidance to the BLM of the need to consider fuel reduction and fire control practices in all management decisions. If the BLM will only listen to that guidance and utilize the information provided by ranchers with intimate knowledge of their allotment and the techniques developed by academia and the ARS, the poor grazing practices which can be a threat to Sage grouse habitat will cease and good grazing practices which can improve Sage grouse habitat as well as the health of the range for all resources can begin.</p> <p>These amendments are a step in the right direction in that process.</p> <p>Ted Hoffman, DVM 600 NE Broken Circle Dr., Mountain Home ID 83647</p>
<a href="#">ID-GRSG-1-218759</a>	Strengthen Protections for Sage-Grouse -- 2018 Idaho Greater Sage-Grouse Draft Resource Management Plan Amendment and Environmental Impact Statement	Please see attached comments.
<a href="#">ID-GRSG-1-218889</a>	Comments from The Pew Charitable Trusts	Attached please find comments from The Pew Charitable Trusts on the draft environmental impact statement proposing changes to the Bureau of Land Management’s (BLM) 2015 sage-grouse plans in Idaho.
<a href="#">ID-GRSG-1-218905</a>	Greater Sage-Grouse Conservation Plan	<p>July 31, 2018</p> <p>Dear Forest Service, BLM, and other stakeholders,</p> <p>The priority of the Sage-Grouse Conservation Plan is to conserve an iconic bird species and the habitat it depends upon for its survival in the West. The major emphasis of this plan is conservation, not economic development. Although, if wildlife conservation could dovetail with economic development, this plan could have beneficial impacts for the birds as well as local communities. This plan was created to protect the birds without necessitating Endangered Species Act listing, which would have required a great deal more federal involvement (ESA regulations, etc.). The various stakeholders have put a great deal of time and effort into the creation of this plan already and they want it to be successful.</p> <p>Unfortunately, the currently proposed plan is even weaker than the previous one, which was put in place after consultation with stakeholders including western governors, scientists and conservationists. Further weakening of the original plan, via these proposed amendments, is a slap in the face of all interested stakeholders who have worked so hard to develop this plan to begin with. Additionally, the proposed amendments to this plan appear to be an attempt to put the wants of the gas/oil, mining, and ranching industries over the needs of our wildlife. The states and other stakeholders have an opportunity here to save an iconic species, but only if they work together with a plan that is robust enough to get the job done, namely one that increases the number of the Greater Sage-Grouse range-wide and protects all of its necessary habitat, including sagebrush focal areas.</p> <p>The announced plan revisions, namely the removal of “sagebrush focal areas” from the original conservation plan text, threatens the protections for sage-grouse on millions of acres of public lands. I do not support any proposed amendments to the Greater Sage-Grouse Conservation Plan that would allow new surface disturbances or the opening of these areas (SFA’s) to new hardrock mining claims. Weakening protections would have significant consequences for sage-grouse and other wildlife, sagebrush grasslands and the western communities and economies that depend on them. Rather than wasting time on trying to weaken the federal plans, the Trump administration should consider ways to improve them. Scientists have already identified gaps and deficiencies in the current conservation strategy, and have recommended measures to strengthen conservation and management of the species:</p>

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		<p>1. Conserve all of the most important sage-grouse habitat, including Sagebrush Focal Areas within Priority Habitat Management Areas. As an example, winter habitat is particularly important to sage-grouse, mule deer and other wildlife, but the current federal plans fail to protect those areas from harmful land use and development. In the Sagebrush Focal Areas as listed in the original 2015 plan, federal land use plans will avoid new surface disturbance and recommend that the areas be withdrawn from new hardrock mining claims.</p> <p>2. Connect sage-grouse habitats. The federal government developed fifteen plans covering the sage-grouse’s eleven-state range, but failed to stitch them together into a matrix that can provide for the species across federal jurisdictions and state boundaries. It is essential that these various plans work together and with the federal plan.</p> <p>3. Protect sagebrush reserves. It is important, particularly in light of climate change, that land managers set aside areas both where sage-grouse are now and where they will need to go in the future; the current conservation plans fail to provide that direction.</p> <p>4. Reduce manageable impacts in sage-grouse habitat. Some threats to sage-grouse are difficult to manage, such as wildfire and invasive species. The federal conservation strategy should compensate for those impacts by emphasizing management of land uses that we can control, such as improperly managed livestock grazing, which contributes to unnatural fire and the spread of invasive species.</p> <p>5. Restore degraded sage-grouse habitat. Sage-grouse have already lost nearly half their range to agriculture and development. If there is to be any hope for the different state and federal plans to work together, this loss of habitat must cease. The federal sage-grouse conservation strategy should be updated to support active restoration of areas that can still be used by sage-grouse and other wildlife.</p> <p>I urge you to strengthen this conservation plan, not weaken it, and make it more protective of the sage-grouse. Afterall, it is the sage-grouse that we’re all working so hard to protect. Again, I must stress that the main priority of the Sage-Grouse Conservation Plan is the protection of the current population of sage-grouse and a significant increase in the numbers of these birds over their current range throughout the 11 participating states. Any actions that weaken this plan or make it less effective will make recovery of this iconic species even more uncertain.</p> <p>Thank you for this opportunity to express my concerns.</p> <p>Sincerely, LeeAnn Bennett</p>
<a href="#">ID-GRSG-1-218935</a>	P4 Production LLC Comments	<p>Attn Johathen Beck,</p> <p>Please find the attached document containing P4 Production, LLC comments regarding the Idaho Greater Sage-Grouse Draft Resource Management Plan Amendment. Thank you for the opportunity to comment.</p> <p>Sincerely, Randy K Vranes Busines Unit Lead, Mineral Activities Monsanto Co 1853 Hwy 34 N Soda Springs, ID 83276</p>
<a href="#">ID-GRSG-1-219011</a>	Sage grouse need our help	We need to protect Sage grouse, and Sage gruse habitat for future generations. It is our responsibility to ensure these protections , and to hand off that responsibility in good faith to the next generation, knowing that we did our part !
<a href="#">ID-GRSG-1-219019</a>	GRSG Draft	The BLM should honor the original plans and implement strong conservation measures to protect the greater sage-grouse and the habitat that makes Montana the last best place.
<a href="#">ID-GRSG-1-219021</a>	WWP et al. 2018 comments	The following comments are being submitted in response to the Bureau of Land Management’s Idaho Greater Sage-Grouse Draft Resource Management Plan Amendments (“DRMPA”) and Draft Environmental Impact Statement (“DEIS”) released in May 2018. The following comments are being submitted on behalf of the members of Western Watersheds Project, Prairie Hills Audubon Society, Center for Biological Diversity, Advocates for the West, American Bird Conservancy, WildEarth Guardians and the Sierra Club. We incorporate by reference all previous comments, protests, and litigation filings pertaining to any of BLM’s Greater sage-grouse planning efforts.
<a href="#">ID-GRSG-1-219026</a>	Comments on Entire Draft RMPA/EIS	Please see the attached comments on the Honorable Scott Bedke, Speaker of the Idaho House of Representatives.
<a href="#">ID-GRSG-1-219032</a>	American Bird Conservancy Comment Letter	<p>Thank you for the opportunity for American Bird Conservancy to comment on the draft Idaho Greater Sage-Grouse Resource Management Plan Amendment and Environmental Impact Statement. American Bird Conservancy has been participating in the region-wide planning initiative since its inception, and we are concerned that the proposed changes to Greater Sage-Grouse conservation plans in Idaho and other states have the potential to put the grouse at greater risk and increase the prospect of</p>

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		<p>sagebrush habitat loss.</p> <p>The purpose of this comment is to provide input to ensure that the Greater Sage-Grouse no longer suffers severe population declines and habitat loss. We are concerned about piecemeal review of a region-wide initiative and the potential for uneven management of Greater Sage-Grouse habitats and populations in each state; there needs to be clear and consistent approaches to grouse management. The needs of the Greater Sage-Grouse do not change from state-to-state, therefore American Bird Conservancy urges for more uniform management across the region.</p> <p>This can be accomplished through incorporating the standards in the conservation checklist which has been attached for your convenience into each of the draft resource management plans. We request that the Bureau withdraw and then revise the draft RMPA/EIS for Idaho to include this conservation alternative.</p> <p>American Bird Conservancy notes there are instances where the proposed Idaho plan does not follow the management recommendations of scientists, leaving open the potential for further habitat loss or degradation. American Bird Conservancy is further concerned that important processes including mitigation and adaptive management to safeguard against habitat loss are being weakened or eliminated.</p> <p>The first issue we want to highlight is the importance of Sagebrush Focal Area Designations. The Bureau proposes to eliminate the Sagebrush Focal Areas (SFAs) and have them managed as priority habitat management areas (PHMA). This elimination of SFAs would allow leasing of mineral withdrawal in Greater Sage-Grouse habitats and increase the risk of population declines of the species.</p> <p>Despite the presence of this risk, the Bureau incorrectly claims SFAs do not solve any of the issues facing the environment of the State. The Bureau also makes the egregious claim that removal of the SFAs designation would have no measurable effects on the conservation of Greater Sage-Grouse in Idaho. We find these claims about SFAs in the RMPA/EIS problematic because the elimination of these designated areas will eventually cause the Greater Sage-Grouse and sagebrush in Idaho to be increasingly vulnerable.</p> <p>The Bureau is to be commended for the adaptive management strategy included in the 2015 sage grouse conservation plans. The strategy adopted two triggers that are signals for harmful impacts on Sage-Grouse populations. The first line of triggers are population soft triggers are defined as “[a] 10 percent decline in the current 3-year average of total maximum number of males counted compared to the 2011 maximum baseline&amp;hellip;.” The 80 percent confidence interval change to the soft trigger will be an earlier warning of potential problems, and it would allow a time response to prevent tripping the second line of triggers, hard triggers. However, the Bureau intends to apply only soft triggers to its new plan.</p> <p>Even though the presence of an adaptive management strategy is commendable, we take issue with a couple of aspects of the strategy. First, using the 2011 maximum baseline male population is too low for the population to no longer be in danger. The population should flourish, not stay stagnant and at its lowest point. Having this low population baseline does not eliminate the risk for the Greater Sage-Grouse and its habitat. Second, the Bureau’s Preferred Management Alignment Alternative varies from the No Action Alternative is major areas. Initially the triggers were to be analyzed twice a year to see if any of the adaptive management triggers had been met, but now the Bureau was the cut that to an annual analysis. This annual analysis will inhibit the Bureau’s response to changes to the Greater Sage-Grouse that occur through the year.</p> <p>Moreover, the removal of hard triggers in the adaptive management response comes when the habitat or maximum male population count returns to or exceeds the 2011 baseline levels within the associated conservation area in accordance with the adaptive management strategy. Like mentioned above, this would only leave the soft trigger in place. Removing the hard triggers means the Greater Sage-Grouse and its habitat would lose their second line of defense against the harmful anticipated cumulative impacts.</p> <p>We are concerned by the proposed modification of the Bureau’s mitigation strategy to align with the State no net loss mitigation strategy. The Bureau claims the net gain mitigation standard is an elusive standard that has no benefits and no authority can require a net conservation gain standard. Also, land designated as a PHMA, IHMA, and GHMA can be released from federal management if the Bureau demonstrates there is no net loss of the Greater Sage-Grouse or no adverse impact on the land. However, due to anticipated cumulative impacts in the planning area, American Bird Conservancy sees the net conservation gain standard as necessary to the vitality of the Greater Sage-Grouse in Idaho. The standard would help ensure the Greater Sage-Grouse population can recover by improving the sagebrush habitat condition in Idaho.</p> <p>Due to weaknesses in the management standards included in the federal plans, adaptive management, including the use of hard triggers, and mitigation using a net conservation benefit standard are necessary to ensure effectiveness and that grouse are being conserved. Recent policy changes to eliminate mitigation requirements on</p>

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		<p>projects effecting federal lands, and changes to the Instructional Memorandum for adaptive management and mitigation, including no longer avoiding leasing oil and gas in priority sage grouse habitat, have eliminated essential safeguards and backstops, and increase the risk of endangerment.</p> <p>The Greater Sage-Grouse conservation plans identify the most important sagebrush habitat, but fall short on avoiding future impacts by not designating reserve areas where no further disturbance to grouse habitat would be allowed. Development and use of priority Sage Grouse habitat is allowed to continue with some important exceptions and limitations, provided that any unavoidable impacts will be mitigated. As a result, the mitigation policy was critically important to ensuring that the Sage Grouse conservation plans are a success.</p> <p>The best way to prevent the loss of wildlife and other natural resources is the maintenance of intact ecosystems. However, when development is deemed necessary, mitigation policies are likely to have significant benefits for birds and their habitats. Foremost among these is calling on federal agencies to ensure projects provide a net benefit and no loss of irreplaceable resources by mitigating the impact of development projects on the environment and offsetting any impact those projects have on wildlife and their habitats. We strongly endorse the mitigation hierarchy that seeks to avoid habitat loss on state and federal lands through smart planning, to minimize impacts by requiring best management practices, and, when needed, to compensate for any unavoidable impacts.</p> <p>American Bird Conservancy agreed with the Department of the Interior Landscape-Scale Mitigation Policy’s direction regarding compensatory mitigation, which said, “measures should not be considered until after all appropriate and practicable avoidance and minimization measures have been applied.” Through the creation of a fair and transparent compensation system, significant private resources can be directed to conserving and restoring important bird habitats.</p> <p>Lastly, we applaud the Landscape-Scale Mitigation Policy’s consideration of greenhouse emissions and carbon storage. Ending fossil fuel development and keeping carbon stores underground are essential to counter the impacts of climate change.</p>
<a href="#">ID-GRSG-1-219039</a>	Honor the deal	please honor the deal!! SageGrouse are an important indicator species. In other words -no sagegrouse?- we screwed up big time!
<a href="#">ID-GRSG-1-219043</a>	Honor doing the right conservation efforts for our country and its future generations	Honor the deal made with other states to best coordinate, communicate, and collaborate for the conservation of sage grouse and other species and for more than adequately preserving our public lands and private ranch lands for future generations. Southwest Montana should be removed from the state of Idaho’s DEIS because, well, SW MT is still part of MT, it’s not ID.
<a href="#">ID-GRSG-1-219056</a>	Re: 2018 Idaho GRSG Draft RMPA/EIS	<p>Dear Mr. Beck</p> <p>This comment contains 121 comments from individual citizens and members of The Wilderness Society in state (please see the attached PDF with comments). The comments support keeping the core commitments of the plans intact. We expect the BLM will read and count these comments.</p> <p>Thank you, Kim Stevens The Wilderness Society</p>
<a href="#">ID-GRSG-1-219064</a>	Sage Grouse Deal for Southwest Montana	Honor the deal. Protect all Sage Grouse everywhere but especially in Southwest Montana!!!
<a href="#">ID-GRSG-1-219065</a>	Re: 2018 Idaho GRSG Draft RMPA/EIS	<p>Dear Mr. Beck,</p> <p>This comment contains 4,326 comments from individual citizens and members of The Wilderness Society nationally (please see the two attached PDFs with comments, posted as two comments here). The comments support keeping the core commitments of the plans intact. We expect the BLM will read and count these comments.</p> <p>Thank you, Kim Stevens The Wilderness Society</p>



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<a href="#">ID-GRSG-1-219070</a>	TRCP Comment Letter	The Theodore Roosevelt Conservation Partnership (TRCP) greatly appreciates the opportunity to comment on the Bureau of Land Management’s (BLM) Idaho Greater Sage-Grouse (GSG) Draft Resources Management Plan Amendment and Environmental Impact Statement Idaho (DEIS), attached in this correspondence.
<a href="#">ID-GRSG-1-219072</a>	Comments of AEMA	Attached are the comments of the American Exploration & Mining Association on the 2018 Idaho GRSG Draft RMPA/DEIS
<a href="#">ID-GRSG-1-219079</a>	Comments from The Wilderness Society et al.	Attached please find comments submitted on the Idaho Draft EIS on behalf of The Wilderness Society, National Audubon Society, Western Values Project, National Wildlife Federation and Natural Resources Defense Council, as well as the two referenced attachments.
<a href="#">ID-GRSG-1-219079</a>	Comments from The Wilderness Society et al.	This is attachment 2 to comments from The Wilderness Society, National Audubon Society, Western Values Project, National Wildlife Federation and Natural Resources Defense Council.
<a href="#">ID-GRSG-1-219090</a>	Simplot Idaho 2018 GRSG DEIS Comments	Please see the attached comments.
<a href="#">ID-GRSG-1-219110</a>	Re: Greater Sage&#8208;Grouse Resource Management Plan Amendments and Environmental Impact Statements	<p>The Pew Charitable Trusts submits the following comments on behalf of 6,390 individuals who submitted them via our website. Pew compiled and is submitting these comments as a service to members of our mailing list, and our submission of others” comments should not be construed as an endorsement of any specific comment.</p> <p>We ask that you consider each of these 6,390 individual comments as the Bureau of Land Management makes decisions about the future of greater sage&amp;#8208;grouse habitat conservation.</p>
<a href="#">ID-GRSG-1-219111</a>	Re: Greater Sage&#8208;Grouse Resource Management Plan Amendments and Environmental Impact Statements	<p>The Pew Charitable Trusts submits the following comments on behalf of 6,364 individuals who submitted them via our website. Pew compiled and is submitting these comments as a service to members of our mailing list, and our submission of others” comments should not be construed as an endorsement of any specific comment.</p> <p>We ask that you consider each of these 6,364 individual comments as the Bureau of Land Management makes decisions about the future of greater sage&amp;#8208;grouse habitat conservation.</p>
<a href="#">ID-GRSG-1-219123</a>	Comments from Pacific Legal Foundation	See attachment.
<a href="#">ID-GRSG-1-219130</a>	IFBF - Comments	<p>BLM,</p> <p>Attached are Idaho Farm Bureau’s comments regarding BLM’s proposed amendments to the sage-grouse resource management plan.</p> <p>Thank you for your consideration.</p> <p>Sincerely,</p> <p>Idaho Farm Bureau Federation</p>
<a href="#">ID-GRSG-1-219135</a>	Public comments from supporters of the National Audubon Society	<p>Please find attached an Excel spreadsheet (.xls) containing the comments of 11,073 supporters of the National Audubon Society. Many people submitted personalized comments; others signed on to either the Idaho or national comments that can be found below. We are submitting the national comments to all six states as there was no option for our members from around the country who care about bird conservation across the sagebrush ecosystem to voice their concerns. Personalized Idaho comments are on the first worksheet, Idaho comments on the second worksheet, national personalized comments on the third worksheet, and common national comments on the fourth worksheet.</p> <p>If you have any questions about the comments, prefer to receive them in a different format, or need additional information about the individuals submitting comments, please do not hesitate to contact me.</p> <p>Please accept our thanks for ensuring that the comments of these concerned individuals are considered.</p> <p>Idaho Comments</p> <p>=====</p> <p>Living here in Idaho, I strongly oppose any efforts to weaken the conservation protections in the BLM’s sage-grouse land management plans.</p> <p>In 2010, the U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse populations were in serious trouble and warranted protection under the Endangered Species Act (ESA).</p> <p>The state of Idaho and many stakeholders worked for many years on ensuring that sage-grouse management is based on science and good for our local economies. The plans</p>

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		<p>that were agreed to in 2015 led the FWS to reverse its 2010 decision and find the future for sage-grouse was secure: a historic victory for conservation and for collaboration. Instead of amending the plans by weakening protections, BLM should focus on engaging communities in the decisions necessary to implement the plans as they are. Give the plans a chance to work.</p> <p>If there are any changes that experts deem necessary, these should instead be done via minor plan amendments, also known as “maintenance actions.” A complete rewrite is an unnecessary waste of federal resources, and risks upending the FWS’s 2015 finding.</p> <p>The draft plan for Idaho removes key elements that biologists believe are necessary to avoid the need for listing the species as threatened or endangered under the ESA. Specifically, the BLM should:</p> <ul style="list-style-type: none"><li>* Montana requested no changes to their BLM plans. The Department of the Interior should honor that and remove southwestern Montana from the Idaho Draft EIS.</li><li>* Do not strip the fundamental “net conservation gain” standard. No net loss of habitat merely prevents additional habitat loss and is not adequate for long-term recovery.</li><li>* Good mitigation policy and practice is also one of the best opportunities to achieve sustainable development and conservation goals. Where impacts cannot be avoided or minimized, well-designed compensatory mitigation programs can achieve the multiple-use, sustained yield objectives.</li><li>* Development on existing leases should be managed under current regulations, which limit surface occupancy and disturbance. Years of research leave no doubt that sage-grouse do not do well in close proximity to energy development. In addition:<ul style="list-style-type: none"><li>- Do a better job of protecting Priority Habitat Management Areas by reducing oil/gas development impacts. New development should be prioritized outside these important population areas and strong buffers maintained around sage-grouse leks.</li><li>- Restore No Surface Occupancy stipulations as mandatory for sage-grouse habitat when leasing for energy development. Allowing exceptions, in light of what we know with the science, will result in poorly planned development that negatively impacts habitat and leads to fewer birds.</li></ul></li><li>* Improve plan monitoring and oversight, including providing training to field staff and the necessary incentives to ensure proper implementation. The plans should contain metrics by which conservation success can be measured. Conservation metrics will help in effective management of the habitat and reduce wasting personnel time and limited funds.</li><li>* The plans contain many new provisions that serve as loopholes and exceptions to habitat protections. We need certainty that crucial habitat will be protected to ensure the species thrives into the future.</li></ul> <p>Thank you for considering my comments.</p> <p>=====</p> <p>National Comments</p> <p>=====</p> <p>As someone who cares about birds and the places they need, I strongly oppose any efforts to weaken the conservation protections in the Bureau of Land Management’s (BLM) sage-grouse land management plans. These birds are part of an iconic western ecosystem, the sagebrush habitat, which supports over 350 species including Golden Eagles and mule deer. They are an important part of our heritage.</p> <p>In 2010, the U.S. Fish and Wildlife Service (FWS) determined that the Greater Sage-Grouse populations were in serious trouble and warranted protection under the Endangered Species Act (ESA).</p> <p>An unprecedented numbers of stakeholders across the West worked for many years on ensuring that sage-grouse management is based on science and good for our local economies. The plans that were agreed to in 2015 led the FWS to reverse its 2010 decision and find the future for sage-grouse was secure: a historic victory for conservation and for collaboration.</p> <p>Instead of amending the plans by weakening protections, BLM should focus on engaging communities in the decisions necessary to implement the plans as they are. Give the plans a chance to work.</p> <p>If there are any changes that experts deem necessary, these should instead be done via minor plan amendments, also known as “maintenance actions.” A complete rewrite is an unnecessary waste of federal resources, and risks upending the official finding made by the FWS that a listing under the ESA is not needed.</p> <p>These federal management plans must keep key elements that biologists believe are necessary to avoid the need for listing the species under the ESA. Specifically:</p> <ul style="list-style-type: none"><li>* Development on existing leases should be managed per regulations that are currently in place, which limit surface occupancy and disturbance. Years of research leaves no doubt that sage-grouse do not do well in close proximity to energy development. More development in the most important habitat will not help conserve the species.</li><li>* Good mitigation policy and practice is one of the best opportunities to achieve sustainable development and conservation goals. Where impacts cannot be avoided or minimized, well-designed compensatory mitigation programs can achieve the multiple-use, sustained yield objectives.</li><li>* Do not strip the fundamental mitigation goal of “net conservation gain” from the plans. A no net loss of habitat merely prevents additional habitat loss and is not adequate to achieve long-term conservation of sage-grouse.</li><li>* Improve plan monitoring and oversight, including providing training to field staff and the necessary incentives to ensure proper implementation. The plans should contain metrics by which conservation success can be measured. Conservation metrics will help in effective management of the habitat and reduce wasting personnel time and limited</li></ul>



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		<p>funds.</p> <p>* The plans contain many new provisions that serve as loopholes and exceptions to habitat protections. We need certainty that crucial habitat will be protected to ensure the species thrives into the future.</p> <p>Thank you for considering my comments.</p> <p>=====</p>
<a href="#">ID-GRSG-1-219139</a>	State of Idaho comments	Attached are the State of Idaho’s comments on the Idaho Greater Sage-grouse Draft Resource Management Plan Amendment and Environmental Impact Statement. Enclosed in this attachment is a cover letter and the State of Idaho’s recommendations based on working hand-in-hand with the BLM and input and recommendations from key stakeholders on how to best improve certain elements of the federal plan.
<a href="#">ID-GRSG-1-219140</a>	Western Energy Alliance Comments on the Draft ID GrSG RMPA	Western Energy Alliance Comments on the Draft ID GrSG RMPA
<a href="#">ID-GRSG-1-219144</a>	2018 Idaho GRSG Draft RMPA/EIS	<p>Please continue to implement the 2015 Sage-Grouse Habitat Conservation Plan for Idaho. The 2015 Plan is based on best available science coupled with an unprecedented collaborative effort bringing together sportsmen, industry, elected officials, conservationists, ranchers, developers and scientists. Some of the scientists working on these plans spent their entire careers studying sage-grouse. The 2015 Plan struck a balance between economic development and conservation.</p> <p>There are some people who never wanted habitat plans for sage-grouse. They put short term economic gains ahead of ecosystem conservation. Weakening the 2015 Habitat Plan provides these people with an opportunity to unravel the entire conservation plan, putting sage-grouse and sage-steppe ecosystems at dire risk. I believe the 2015 plans are the last chance we have to maintain what little viable habitat is left for sage-grouse. With catastrophic fire, conversion to invasives such as cheat grass, over grazing, oil and gas development and urban sprawl, sage-grouse and over 350 other sagebrush dependent species face a dire future. These 2015 plans were crafted to strike a balance between habitat protection and economic development.</p> <p>In summary, implement the 2015 Habitat Plan. Do not revise the plan. Do not weaken the grazing standards. We can have livestock grazing AND sage-grouse through good range management. Keep oil and gas leasing out of quality sage-grouse habitat. Continue to place fire fighting priorities in quaitly sagebrush habitat. Implement the 2015 protections for the future of the sagebrush ecosystem in Idaho. We are counting on you.</p>